

## Jonathan Arthur

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**From:** Anne Lahren <alahren@PenderCoward.com>  
**Sent:** Thursday, October 7, 2021 5:39 PM  
**To:** Jonathan Arthur; 'Coreen Silverman'  
**Subject:** RE: Nazario v. Gutierrez, et. al.  
**Attachments:** 10.07.2021 ltr to Arthur with Crocker discovery to Plaintiff.pdf; 10.07.2021 Crocker ROGS and RFP to Nazario.pdf; 10.07.2021 Crocker ROGS and RFP to Nazario WORD.docx

Jonathan:

Thank you. Electronic delivery is fine with me – no need to send by mail.

I received the link to the Dropbox from Tom Roberts but I don't see anything in it. But if you're just waiting to upload documents until the Protective Order is entered, I certainly understand.

**Please see my cover letter and Crocker's first Interrogatories and Requests for Production of Documents – Attached.**

Since I'm adding this onto this email, please confirm receipt of these. I'm not trying to sneak it by you. Also, I've attached the discovery in Word for ease of preparing responses. For Responses to the Requests for Production of Documents, it's fine to reference the corresponding response to requests from Gutierrez's discovery as applicable.

Sincerely,  
Annie

Anne C. Lahren  
ATTORNEY

**PENDER & COWARD**  
ATTORNEYS AND COUNSELLORS AT LAW

(757) 490-6293 | fax (757) 502-7370

[alahren@pendercoward.com](mailto:alahren@pendercoward.com)

Crocker's Counsel  
giving explicit  
permission to cite  
to his responses to  
Gutierrez'  
discovery.

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**From:** Jonathan Arthur <j.arthur@robertslaw.org>

**Sent:** Thursday, October 7, 2021 5:09 PM

**To:** 'Coreen Silverman' <csilverman@hancockdaniel.com>; Anne Lahren <alahren@PenderCoward.com>

**Subject:** Nazario v. Gutierrez, et. al.

\*\*\*External Email\*\*\*

Counselors:

Please see the attached responses to Gutierrez' first discovery. I understand that the Certificate of Service states that these have also been mailed, but if it is alright with you all, I will save the paper and deliver it electronically. If you want I can send an amended Certificate.

Also, some documents and interrogatory answers have been withheld pending the protective order. When the court enters it, I will release the documents and the answers to the interrogatories that I want to designate under the order. I believe that Tom Roberts as also sent you all a dropbox link to the responsive documents. Let me know if you have not received it.

Plaintiff transmitted his answers to Gutierrez's  
discovery to counsel for both defendants.

**EXHIBIT 2**

Cordially,

Jonathan M. Arthur, Esq.  
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We care about the safety and wellbeing of our employees, clients, friends and communities as we serve the needs of our clients. We ask that all employees, clients and guests wear masks in our offices until further notice. For more information on our firm's operations and plan in response to COVID-19, please call us at 757-490-3000. [Click here for helpful COVID-19 articles and resources.](#)